

Duff Law PLLC

Anderson J. Duff
Managing Member
(646) 450-3607
ajd@hoganduff.com

March 22, 2023

VIA ECF

Hon. Analisa Torres
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: *Eli Erlick v. Blaire White*, 23 Civ. 1017 (AT) (SDNY)
Letter Motion Requesting Thirty-Day Extension of Time to Answer

Dear Judge Torres:

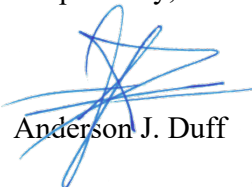
In accordance with Your Honor's individual Rule III.B.ii, Defendant served her first pre-motion letter outlining Defendant's contemplated motion to dismiss on March 20, 2023 before the deadline for Defendant's response to the Complaint in the above-captioned action. On March 21, 2023, counsel for both parties engaged in a productive telephonic discussion of Defendant's March 20, 2023 letter and potential settlement options. In light of this discussion, counsel for both parties believe that an extension of Defendant's time to respond to Plaintiff's Complaint would facilitate ongoing settlement discussions and allow the parties to exchange the first and, if needed, second round of pre-motion letters in accordance with Your Honor's individual rules.

Defendant's response to the Complaint in the above-captioned matter was due on March 20, 2023 the date on which Defendant served her first pre-motion letter on Plaintiff's counsel. Both Parties believe that a 30-day extension of Defendant's time to respond to the Complaint would allow productive settlement discussions to continue. Neither party has previously requested any extension of a deadline in this matter. Plaintiff's counsel consents to this requested 30-day extension.

For the foregoing reasons and in accordance with Your Honor's individual rules, Defendant hereby asks for a 30-day extension of the deadline for her response to the Complaint in this action.

Respectfully,

By:


Anderson J. Duff

AJD/jo